

## REMARKS

### I. Introduction

In response to the Office Action dated December 2, 2005, claims 9, 10, 24, 25, and 26 have been canceled, and claims 1, 51, 79, 80 and 81 have been amended. Claims 1-8, 11-23 and 27-82 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. Non-Art Rejections

On page (2) of the Office Action, claims 51 and 79-81 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite.

Applicants' attorney has amended claims 51 and 79-81 to overcome this rejection.

### III. Prior Art Rejections

#### A. The Office Action Rejections

In the Office Action, the following prior art rejections are made:

1. Claims 1-3, 9-13, 24-26 and 38-39 are rejected under 35 U.S.C. 103(a) as being obvious over Beck, U.S. Patent No. 6,138,139, "Method and apparatus for supporting diverse interaction paths within a multimedia communication center" (October 29, 1998) in view of Nasr, U.S. Patent No. 5,018,215, "Knowledge and model based adaptive signal processor" (March 23, 1990) and in further view of Hartnett, U.S. Patent No. 6,064,971, "Adaptive knowledge base" (June 7, 1995).
2. Claims 4-6, 8, 14, 27-30, 32-33 and 35 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Hartnett and in further view of Register, U.S. Patent No. 5,371,807, "Method and apparatus for text classification" (December 6, 1994).
3. Claim 7 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Hartnett in view of Register and in further view of Tokume, U.S. Patent No. 5,101,349, "Natural language processing system" (March 31, 1992).
4. Claim 15 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Hartnett in view of Register and in further view of Parmentier,

"Logical structure recognition of scientific bibliographic references" (August 18-20, 1997).

5. Claims 16-17 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Hartnett in view of Register in view of Parmentier and in further view of Higgins, U.S. Patent No. 5,754,671, "Method for improving cursive address recognition in mail pieces using adaptive data base management" (May 19, 1998).
6. Claims 18-22 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Hartnett and in further view of Liddy, U.S. Patent No. 6,006,221, "Multilingual document retrieval system and method using semantic vector matching" (December 21, 1999).
7. Claim 23 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Hartnett and in further view of Kohn, U.S. Patent No. 5,963,447, "Multiple-agent hybrid control architecture for intelligent real-time control of distributed nonlinear processes" (October 5, 1999).
8. Claim 31 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Hartnett in view of Register and in further view of Bowman-Amuah, U.S. Patent No. 6,256,773, "System, method and article of manufacture for configuration management in a development architecture framework" (August 31, 1999).
9. Claim 34 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Hartnett in view of Register and in further view of Bennett, U.S. Patent No. 6,615,172, "Intelligent query engine for processing voice based queries" (November 12, 1999).
10. Claims 36-37 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Hartnett and in further view of Bennett.
11. Claims 40 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Hartnett and in further view of Higgins.
12. Claims 41, 44-46, 49, 56 and 60 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Akkiraju, U.S. Patent No. 6,490,572, "Optimization prediction for industrial processes" (May 15, 1998).

13. Claim 42 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Akkiraju and in further view of Tokume.
14. Claims 43 and 47 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Akkiraju and in further view of Masand, U.S. Patent No. 5,251,131, "Classification of data records by comparison of records to a training database using probability weights" (October 5, 1993).
15. Claim 48 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Akkiraju in view of Masand and in further view of Kanno, U.S. Patent No. 5,099,425, "Method and apparatus for analyzing the semantics and syntax of a sentence or a phrase" (March 24, 1992).
16. Claims 50-51 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Akkiraju and in further view of Hellerstein, U.S. Patent No. 6,430,615, "Predictive model-based measurement acquisition employing a predictive model operating on a manager system and a managed system" (March 13, 1998).
17. Claims 52-54 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Akkiraju and in further view of Bennett.
18. Claims 55 and 59 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Bennett and in further view of Wheeler, U.S. Patent No. 6,618,727, "System and method for performing similarity searching" (September 22, 1999).
19. Claims 57-58 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Akkiraju and in further view of Bowman-Amuah.
20. Claims 61-62 and 73-77 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Nasr in view of Bigus, U.S. Patent No. 5,745,652, "Adaptive resource allocation using neural networks" (April 28, 1998).
21. Claim 78 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Bigus.
22. Claims 63, 65 and 67-72 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Bennett and in further view of Bigus.
23. Claim 64 is rejected under 35 U.S.C. 103(a) as being obvious over Beck of al in view of Bennett in view of Bigus and in further view of Bowman-Amuah.

24. Claim 66 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Bennett in view of Bigus and in further view of Hellerstein.
25. Claims 79-80 are rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Bigus in view of Hellerstein of al and in further view of Johnson, "Adaptive model-based neural network control" (May 13-18, 1990).
26. Claim 81 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Bigus and in further view of Hellerstein.
27. Claim 82 is rejected under 35 U.S.C. 103(a) as being obvious over Beck in view of Bigus and in further view of Horvitz, U.S. Patent No. 6,161,130, "Technique which utilizes a probabilistic classifier to detect "junk" e-mail by automatically updating a training and re-training the classifier based on the updated training set" (June 23, 1998).

Applicants' attorney respectfully traverses these rejections.

B. Arguments for Patentability

1. Independent Claim 1

With regard to independent claim 1, and the rejection under 35 U.S.C. 103(a) as being obvious over Beck, Nasr and Hartnett, Applicants' attorney traverses the rejection.

The cited references do not teach or suggest a system for electronic communication management comprising: a contact center configured to send and receive communications; a modeling engine configured to analyze a communication received by the contact center and determine an intent of the received communication, wherein the modeling engine is configured to automatically retrieve a model based on the intent of the received communication; an automatic response module supported by the modeling engine that generates a predicted response to the received communication using the retrieved model; an agent that composes an actual response to the received communication using the retrieved model; an adaptive knowledge base configured to store the models used by the modeling engine; and a feedback module configured to compare the actual response to the received communication with the predicted response to the received communication and provide feedback to the modeling engine, which uses the feedback to update the models in the adaptive knowledge base, so as to improve subsequent predicted responses to received communications.

With regard to an adaptive knowledge base, the cited portions of Nasr merely describe a knowledge and model based adaptive signal processor (KMBASP) that automatically adapts parameters for an automated object recognition (AOR) system as scenarios change so that AOR can maintain optimum performance. However, Nasr relates to identifying targets (images) for battlefield missions, not to an adaptive knowledge base that stores models used in the context of analyzing communications received by a contact center.

With regard to a feedback module, the cited portions of Hartnett merely describe a Sustainable Development Server (an adaptive knowledge base to further the pursuit of sustainable development) where participants provide the feedback by reviewing, evaluating and contributing to structured information in an adaptive knowledge base specializing in sustainable development. However, Hartnett relates to tools and methods useful for privatizing, or transferring from state ownership to individual ownership, large state enterprises in newly democratic nations, not to a feedback module used in the context of a contact center, where the feedback module compares the actual response to the received communication with the predicted response to the received communication, and provides feedback to the modeling engine, which uses the feedback to update the models in the adaptive knowledge base, so as to improve subsequent predicted responses to received communications.

Consequently, the combination of references fail to teach or suggest all the limitations of Applicants' independent claim 1.

Moreover, Applicants' attorney submits that Beck, Nasr and Hartnett cannot be combined in the manner suggested by the Office Action, because Beck, Nasr and Hartnett are not relevant to the same problems. Applicants' attorney submits that there would be little motivation to combine a multimedia call center (of Beck), with a military target identification system (of Nasr), and with a privatization planner (of Hartnett), because all of the references are concerned with different problems.

In addition, it is the Office Action that provides the motivation to combine the teachings of the references, rather than the references themselves. Consequently, it is only via hindsight that the Office Action could assert such a combination, or suggest a motivation to combine. Certainly, there is no teaching or suggestion to make the claimed combination found in the prior art itself.

2. Dependent Claims 2-8, 11-23 and 27-40

Claims 2-8, 11-23 and 27-40 depend either directly or via intermediate dependent claims from independent claim 1 and are thus allowable for at least the same reasons as claim 1. In addition, claims 2-8, 11-23 and 27-40 recite additional novel elements not shown by the references.

3. Independent Claim 41

With regard to independent claim 41, and the rejection under 35 U.S.C. 103(a) as being obvious over Beck and Akkiraju, Applicants' attorney traverses the rejection.

The cited references do not teach or suggest a method for managing electronic communications in a computer network, the method comprising: receiving a communication over the computer network; analyzing the communication at a computer coupled to the computer network to determine an intent of the communication; generating a predicted response to the communication based on the intent of the communication; generating an actual response to the communication; and comparing the actual response to the predicted response to improve subsequent predicted responses to communications received over the computer network.

With regard to generating a predicted response, the cited portions of Beck merely describe that outbound campaigns may be configured according to enterprise rules and media preference using a single rule-set knowledge base. However, Beck does not generate a predicted response to the communication based on an intent of the communication that was determined by a modeling engine analyzing the communication.

With regard to comparing an actual response, the cited portions of Akkiraju merely describe prediction methods that anticipate the outcome of a detailed optimization step for optimization problems having a hierarchical structure. However, Akkiraju does not operate in the context of comparing an actual response to a predicted response in order to improve subsequent predicted responses to received communications based on the intent of the communication.

Consequently, the combination of references fail to teach or suggest all the limitations of Applicants' independent claim 1.

Moreover, Applicants' attorney submits that Beck and Akkiraju cannot be combined in the manner suggested by the Office Action. Applicants' attorney submits that would be little

motivation to combine a multimedia call center (of Beck), with a predictive optimizer of hierarchically structured problems (of Akkiraju). For example, while Beck describes multimedia call centers, Akkiraju is concerned with a predictive optimizer for complex optimization problems that are decomposed for determination of candidate solutions. Since the "problem" of responding to calls in Beck is not decomposed in a similar manner to that described in Akkiraju, the predictions of Akkiraju are of no relevance to Beck.

In addition, it is the Office Action that provides the motivation to combine the teachings of the references, rather than the references themselves. Consequently, it is only via hindsight that the Office Action could assert such a combination, or suggest a motivation to combine. Certainly, there is no teaching or suggestion to make the claimed combination found in the prior art itself.

4. Dependent Claims 42-54

Claims 42-54 depend either directly or via intermediate dependent claims from independent claim 41 and are thus allowable for at least the same reasons as claim 41. In addition, claims 42-54 recite additional novel elements not shown by the references.

5. Independent Claim 55

With regard to independent claim 55, and the rejection under 35 U.S.C. 103(a) as being obvious over Beck, Bennett and Wheeler, Applicants' attorney traverses the rejection.

The cited references do not teach or suggest a method for processing a relationship event in a computer network, the method comprising: receiving the relationship event over the computer network; analyzing the relationship event at a computing device coupled to the computer network to identify concepts in the relationship event; building an event model of the relationship event using the identified concepts; mapping the event model to models in a knowledge base to generate category scores; and routing the relationship event over the computer network for action based on the category scores.

With regard to analyzing a relationship event, the cited portions of Bennett merely describes a system for processing speech queries, i.e., SQL queries. However, the analysis being performed is the analysis of user questions during speech recognition, not the analysis of

relationship events to identify concepts therein. Moreover, there is no identification in Bennett of concepts in relationship events, as defined in Applicants' invention.

With regard to building an event model, the cited portions of Bennett merely refer to initializing a COM library including ActiveX controls and performing the speech recognition function using a Viterbi algorithm. However, Bennett does not build an event model of a relationship event using concepts identified in a received communication.

With regard to mapping the event model, the cited portions of Wheeler merely describe similarity searching, which detects and scores similarities between documents in a source database and a search criteria. However, the term "model" is used in Wheeler to describe the database schema, i.e., how the database is structured. Nowhere does Wheeler describe a function of mapping an event model to models in a knowledge base to generate category scores, in the context of an event model built from a relationship event.

With regard to routing the relationship event, the cited portions of Beck merely describe routing "according to enterprise rules." However, enterprise rules as described in Beck are in no way similar to category scores, which are generated by mapping event models to models stored in a knowledge base as described in Applicants' invention, and thus Beck does not teach or suggest routing a relationship event for action based on the category scores.

With regard to generating a predicted response, the cited portions of Beck merely describe that outbound campaigns may be configured according to enterprise rules and media preference using a single rule-set knowledge base. However, Beck says nothing about generating a predicted response to the communication based on the intent of a received communication, wherein the intent of the communication has been determined by analyzing the received communication.

Consequently, the combination of references fail to teach or suggest all the limitations of Applicants' independent claim 1.

Moreover, Applicants' attorney submits that Beck, Bennett and Wheeler cannot be combined in the manner suggested by the Office Action, because Beck, Bennett and Wheeler are not relevant to the same problems. For example, while Beck describes multimedia call centers, Bennett is concerned with a voice recognition of SQL queries, and Wheeler describes detecting and scoring similarities in database searches.



In addition, it is the Office Action that provides the motivation to combine the teachings of the references, rather than the references themselves. Consequently, it is only via hindsight that the Office Action could assert such a combination, or suggest a motivation to combine. Certainly, there is no teaching or suggestion to make the claimed combination found in the prior art itself.

6. Independent Claim 56

Independent claim 56 is a computer-readable medium claim that is similar in scope to the method recited in claim 41. Independent claim 56 is allowable for at least the same reasons as set forth in claim 41.

7. Dependent Claims 57-58

Claims 57-58 depend from independent claim 56 and are allowable for at least the same reasons as claim 56. In addition, claims 57-58 recite additional novel elements not shown by the references.

8. Independent Claim 59

Independent claim 59 is a computer-readable medium claim that is similar in scope to the method recited in claim 55. Therefore, independent claim 59 is allowable for at least the same reasons as set forth in claim 55.

9. Independent Claim 60

Independent claim 60 is a system claim that is similar in scope to the method recited in claim 41. Thus, independent claim 60 is allowable for at least the same reasons as set forth in claim 41.

10. Independent Claim 61

With regard to independent claim 61, and the rejection under 35 U.S.C. 103(a) as being obvious over Beck, Nasr and Bigus, Applicants' attorney traverses the rejection.

The cited references do not teach or suggest a system for electronic communication management, comprising: a contact center configured to send and receive communications via at

least one communication channel; a modeling engine configured to analyze a received communication to determine an intent, and further configured to retrieve data related to the intent; an adaptive knowledge base configured to store models; and a feedback module configured to compare a response predicted by the modeling engine in conjunction with the models in the adaptive knowledge base and an actual response to the received communication to generate feedback, the feedback being used to update the models in the adaptive knowledge base such that the system learns from each received communication.

With regard to an adaptive knowledge base, the cited portions of Nasr merely describe a knowledge and model based adaptive signal processor (KMBASP) that automatically adapts parameters for an automated object recognition (AOR) system as scenarios change so that AOR can maintain optimum performance. However, Nasr relates to identifying targets (images) for battlefield missions, not to an adaptive knowledge base that stores models used in the context of analyzing communications received by a contact center.

With regard to a feedback module, the cited portions of Bigus merely describe resource allocation within a computer system using a neural network for control, and a separate system model for training the neural network. However, Bigus does not operate in the same context as Applicants' invention, and thus does not compare a response predicted by the modeling engine in conjunction with the models in the adaptive knowledge base and an actual response to the received communication to generate feedback, the feedback being used to update the models in the adaptive knowledge base such that the system learns from each received communication.

Consequently, the combination of references fail to teach or suggest all the limitations of Applicants' independent claim 1.

Moreover, Applicants' attorney submits that Beck, Nasr and Bigus cannot be combined in the manner suggested by the Office Action, because Beck, Nasr and Bigus are not relevant to the same problems. Applicants' attorney submits that there would be little motivation to combine a multimedia call center (of Beck), with a military target identification system (of Nasr), and with a computer system resource allocation controller (of Bigus), because all of the references are concerned with different problems.

In addition, it is the Office Action that provides the motivation to combine the teachings of the references, rather than the references themselves. Consequently, it is only via hindsight that the Office Action could assert such a combination, or suggest a motivation to combine.

Certainly, there is no teaching or suggestion to make the claimed combination found in the prior art itself.

11. Dependent Claim 62

Claim 62 depends from independent claim 62 and is allowable for at least the same reasons as claim 61. In addition, claim 62 recites additional novel elements not shown by the references.

12. Independent Claim 63

With regard to independent claim 63, and the rejection under 35 U.S.C. 103(a) as being obvious over Beck, Bennett and Bigus, Applicants' attorney traverses the rejection.

Independent claim 63 is directed to a method for computerized analysis of communications using computer-generated adaptive models, comprising: receiving a communication; analyzing content of the communication on a computer to identify at least one concept of the communication; creating a model of the communication using the at least one concept; comparing the model of the communication to a set of adaptive models to generate a predicted response to the communication; generating an actual response to the communication; comparing the predicted response and the actual response to generate feedback; and using the feedback to modify at least one of the set of adaptive models such that the set of adaptive models learns with each received communication.

With regard to analyzing content of the communication to identify at least one concept, the cited portions of Bennett merely describe a system for processing speech queries, i.e., spoken SQL queries. However, speech recognition merely converts spoken words to text, but does not identify concepts within a communication.

With regard to creating a model, the cited portions of Bennett merely describe initializing a COM library, which includes ActiveX controls, and performing the speech recognition function using a Viterbi algorithm. This COM library is not in anyway related to creating a model of a received communication using concepts identified therein in order to predict responses. Moreover, the Viterbi algorithm is used only for speech recognition, and is not related to concepts.

With regard to comparing the predicted response and the actual response, the cited portions of Bigus merely describe resource allocation within a computer system using a neural network for control, and a separate system model for training the neural network. However, Bigus does not operate in the same context as Applicants' invention, and thus does not compare a predicted response to a received communication and an actual response to a received communication, in order to generate feedback that is used to modify a set of adaptive models such that the set of adaptive models learns with each received communication.

Consequently, the combination of references fail to teach or suggest all the limitations of Applicants' independent claim 1.

Moreover, Applicants' attorney submits that Beck, Bennett and Bigus cannot be combined in the manner suggested by the Office Action, because Beck, Bennett and Bigus are not relevant to the same problems. Applicants' attorney submits that would be little motivation to combine a multimedia call center (of Beck), with a voice recognition system for SQL queries (of Bennett), and with adaptive resource allocation of computer system resources using neural networks (of Bigus), because all of the references are concerned with different problems.

In addition, it is the Office Action that provides the motivation to combine the teachings of the references, rather than the references themselves. Consequently, it is only via hindsight that the Office Action could assert such a combination, or suggest a motivation to combine. Certainly, there is no teaching or suggestion to make the claimed combination found in the prior art itself.

13. Dependent Claims 64-72

Claims 64-72 all depend directly from independent claim 63 and are thus allowable for at least the same reasons as claim 63. In addition, claims 64-72 recite additional novel elements not shown by the references.

14. Independent Claim 73

Independent claim 73 is a system claim that is similar in scope to the system of claim 61. Independent claim 73 is therefore allowable for at least the same reasons as set forth in claim 61.

15. Dependent Claims 74-77

Claims 74-77 depend either directly or via an intermediate dependent claim from independent claim 73 and are thus allowable for at least the same reasons as claim 73. In addition, claims 74-77 recite additional novel elements not shown by the references.

16. Independent Claim 78

With regard to independent claim 78, and the rejection under 35 U.S.C. 103(a) as being obvious over Beck and Bigus, Applicants' attorney traverses the rejection.

Independent claim 78 is directed to a method for real-time learning in a computerized communication management system, comprising: receiving a communication; creating a model of the communication on a computer; comparing the model of the communication to a set of adaptive models to generate a predicted action in response to the communication; comparing the predicted action with an actual action in response to the communication to generate feedback; and updating the set of adaptive models according to the feedback.

With regard to creating a model, the cited portions of Beck merely describe enterprise rules, not models of communication, wherein the rules prioritize interaction events. However, Beck does not disclose generating a model of a communication for the purpose of comparing that model to a set of adaptive models to produce a predicted response.

With regard to comparing models to produce a predicted action, the cited portions of Bigus merely describe the layout of training data for a neural network model, which is used to allocate resources within a computer system. The neural network models of Bigus do not produce a predicted action in the same context as Applicants' invention, i.e., in response to a communication.

With regard to comparing predicted and actual responses to produce feedback, the cited portions of Bigus merely describe different training algorithms for the neural networks, but the neural networks are used for resource allocation in a computer system, not generating feedback to communications received by a contact center.

Consequently, the combination of references fail to teach or suggest all the limitations of Applicants' independent claim 1.

Moreover, Applicants' attorney submits that Beck and Bigus cannot be combined in the manner suggested by the Office Action, because Beck and Bigus are not relevant to the same

problems. Applicants' attorney submits that would be little motivation to combine a multimedia call center (of Beck), with adaptive resource allocation using neural networks (of Bigus), because the references are concerned with different problems.

In addition, it is the Office Action that provides the motivation to combine the teachings of the references, rather than the references themselves. Consequently, it is only via hindsight that the Office Action could assert such a combination, or suggest a motivation to combine. Certainly, there is no teaching or suggestion to make the claimed combination found in the prior art itself.

17. Dependent Claims 79-81

Claims 79-81 all depend directly from independent claim 78 and are thus allowable for at least the same reasons as claim 78. In addition, claims 79-81 recite additional novel elements not shown by the references.

18. Independent Claim 82

With regard to independent claim 78, and the rejection under 35 U.S.C. 103(a) as being obvious over Beck, Bigus and Horvitz, Applicants' attorney traverses the rejection.

Independent claim 82 is directed to a method for real-time modeling of communications in a computerized communication management system, comprising: receiving a communication; creating a model of the communication on a computer; comparing the model of the communication to a set of adaptive models to determine a category for the communication; comparing the determined category with an actual category for the communication to generate feedback; and updating the set of adaptive models according to the feedback.

With regard to creating a model of the communication, the cited portions of Beck merely describe a set of models that handle how agents receive their routed media. However, these models are not models of a communication received by the system, but are models of how the system in Beck operates. For example, the models discussed in Beck are exemplified by enterprise rules that govern customer dialog via predicted dialing, email push, automated recorded messages, and so on. Beck does not disclose generating a model of a communication for the purpose of comparing that model to a set of adaptive models to produce a predicted response.

With regard to comparing the model of the communication, the cited portions of Bigus merely describe resource allocation algorithms for computer system resources that rely on models of the underlying system or process, and feedback connections for training neural networks. Bigus does not disclose comparing the model of the communication to a set of adaptive models to determine a category for the communication.

With regard to comparing the determined category, the cited portions of Horvitz merely describe the classification of an incoming email as spam or not, using an N-element feature vector to generate an associate quantitative output confidence level and a predetermined threshold probability. Should a recipient manually move a message from one folder to another within the mail store, the message is reclassified (such as from being legitimate to spam), and the contents of either or both folders can be accessed and fed back as a new training set to re-train and hence update the classifier. However, Horvitz does not disclose comparing a determined category with an actual category for the communication to generate feedback, wherein the category has been determined by creating a model of a communication, and then comparing the model of the communication to a set of adaptive models.

With regard to updating the set of adaptive models, the cited portions of Bigus merely describe the layout of the training data for neural network system model. Bigus does not disclose updating a set of adaptive models according to feedback generated by creating a model of a communication, comparing the model of the communication to the set of adaptive models to determine a category for the communication and then comparing the determined category with an actual category for the communication.

Consequently, the combination of references fail to teach or suggest all the limitations of Applicants' independent claim 1.

Moreover, Applicants' attorney submits that Beck, Bigus and Horvitz cannot be combined in the manner suggested by the Office Action, because Beck, Bigus and Horvitz are not relevant to the same problems. Applicants' attorney submits that would be little motivation to combine a multimedia call center (of Beck), with a resource allocation system for computer system resources (of Bigus), and with a spam email classifier (of Horvitz), because all of the references are concerned with different problems.

In addition, it is the Office Action that provides the motivation to combine the teachings of the references, rather than the references themselves. Consequently, it is only via hindsight

that the Office Action could assert such a combination, or suggest a motivation to combine. Certainly, there is no teaching or suggestion to make the claimed combination found in the prior art itself.

IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

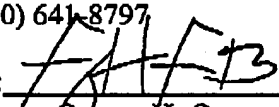
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